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ATTORNEYS FOR DEBTOR SUPERIOR AIR PARTS, INC.

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE:

SUPERIOR AIR PARTS, INC.,

Debtor.

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Case No. 08-36705

Chapter 11

**DEBTOR'S MOTION FOR EXPEDITED HEARING
ON DEBTOR'S MOTION TO REJECT CERTAIN EXECUTORY CONTRACTS**

TO: THE HONORABLE BARBARA J. HOUSER
UNITED STATES BANKRUPTCY JUDGE:

Superior Air Parts, Inc. ("Superior" or "Debtor"), as debtor and debtor-in-possession, seeks an Expedited Hearing on its Motion to Reject Executory Contracts [Docket No. 74] filed on February 4, 2009, as follows:

1. On December 31, 2008, Superior Air Parts, Inc. filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code. The Debtor continues to operate its business and manage its properties and assets as a debtor-in-possession pursuant to

§§ 1107(a) and 1108 of the Bankruptcy Code. An Official Committee of Unsecured Creditors has been appointed in this case.

2. On February 4, 2009, Debtor filed a motion seeking authority to reject certain executory contracts [Docket No. 74] (the "Motion to Reject").

3. Superior sells parts for piston-powered aircraft and has entered into an asset purchase agreement ("APA") to sell substantially all of its assets to Avco Corporation ("Avco"), after the Debtor goes through a bidding procedure and auction. Hearing on the sale to Avco or the winning bidder is set for February 24, 2009 at 3:15 p.m. Due to the impending sale, the Debtor has essentially stopped selling parts or assembling engines and will survive from the collection of accounts receivable until the sale closes. The contracts to be rejected are those contracts that were not contemplated to be assumed and assigned to Avco under the APA and the sale process. The Debtor cannot perform on these contracts.

4. Expedited hearing on the Motion to Reject is warranted because the February 24, 2009 date is already set for the Sale Hearing and by that time, the Debtor will be able to identify the successful bidder. Any executory contracts another potential and successful purchaser might want to assume can be withdrawn prior to the hearing. However, extending the time for which rejection will occur will only delay the process and possibly increase the amount of the rejection damages. The proposed hearing date is still twenty (20) days from the date of filing and service of the Motion, so there is no prejudice to parties in expediting the hearing date by three (3) days, which would normally be required under the Court's self calendaring procedures.

5. Debtor requests that the hearings be set on February 24, 2009 at 3:15 p.m. or such time thereafter as the Court's schedule will permit. This Court has the authority to grant the relief requested herein under 11 U.S.C. § 105 and Bankruptcy Rule 9006.

WHEREFORE, the Debtor request that the Court enter an Order expediting a hearing on the Motion to Reject as requested herein and granting such other and further relief as this Court may deem just and proper.

Respectfully submitted,

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**BANKRUPTCY ATTORNEYS FOR DEBTOR
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CERTIFICATE OF SERVICE

The undersigned certifies that true and correct copies of the foregoing pleading were forwarded to the parties listed below and on the attached service list via first class U.S. Mail, postage prepaid, on the 5th day of February, 2009.

/s/ Duane J. Brescia
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